

Federal Defenders OF NEW YORK, INC.

One Pierrepont Plaza-16th Floor, Brooklyn, NY 11201
Tel: (718) 330-1200 Fax: (718) 855-0760

David E. Patton
*Executive Director and
Attorney-in-Chief*

Deirdre D. von Dornum
Attorney-in-Charge

August 10, 2022

By ECF and Electronic Mail
The Honorable Dora L. Irizarry
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Samantha Shader, 20-cr-202 (DLI)

Dear Judge Irizarry:

We write to respectfully request that the defense objections to the Presentence Investigation Report be filed under seal. We further request to file a redacted version of the objection letter on the public docket. Proposed redactions, which include references to medical history, mental health, sexual abuse, and substance use, are provided under separate cover.

The defense is sensitive to the public's right of access to information regarding judicial proceedings and the imperative that sealing orders should be "narrowly tailored." *Lugosch v. Pyramid Co.*, 435 F.3d 110, 119–20 (2d Cir. 2006). However, sealing is warranted here because the sentencing memorandum supplement and enclosed documents contain information that is "traditionally considered private rather than public" and has no public ramifications. *See United States v. Amodeo*, 71 F.3d 1044, 1049–51 (2d Cir. 1995) (ruling that information may be sealed where its value to the public is outweighed by the privacy interests of the party seeking the sealing order).

Thank you for your consideration of this letter.

Respectfully Submitted,

/s/

Leticia M. Olivera
Samuel I. Jacobson
Assistant Federal Defenders
(917) 612-7269

cc: Counsel of record (by ECF)
U.S. Probation (by Email)